UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

Rose, Marth.
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5-22-86
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May 22, 1986

MEMORANDUM

SUBJECT: Rose Chemical Clean-up Status

FROM: George Hess, Geologist GKH

TO: Charlie Hensley, Chief, EP&R

On May 21, 1986, Phil Keary and I went to the Holden facility of Rose Chemical to monitor the progress of the clean up.

The actual field clean up is under the direction of Gary Sandersted of ETI. ETI has a labor force of three people doing the actual clean up, one from ETI and two from American Steel. Mr. Sandersted indicated the clean up has focused on the oil in the creek although, at the time of the inspection, they had run out of absorbant pads and indicated they could not locate a source around Kansas City. To date, 17 55-gallon drums of material has been generated from the creek since the clean up began.

At 1100 hours, American Steel/ETI removed the 3 1/2-foot diameter steel manhole cover. Present were Dwight Thomas, formerly with Rose, now with American Steel; Gary Sandersted, ETI; and the American Steel/ETI clean-up crew. The manhole is at the junction of two storm sewer lines, one from the east (probably toward a manhole just north of the east entrance to the site) and another line which comes from under the facility (NNE). The sides of the manhole appeared to have relatively fresh oil stains around the entire circumference, and approximately 1/3 of the way to the bottom (approximately 8-9 feet). Only a slight sheen was visible on the water at the bottom of the manhole. The storm sewer is still being diverted to collection ponds at the southwest corner of the site via a ditch. Oil is being caught in the ditch by several booms placed between the pipe (18-24" diameter) and collection pond.

During the investigation Dwight Thomas indicated the following:

1. The tanker that leaked had a compartment capacity of 2650 gallons.

2. The other three compartments contain approximately 5500 gallons of clean oil, i.e., <50 ppm PCB.

3. The material in the compartment that leaked was probably flush material from March 7, 1986.

4. The composite sample from the three compartments showed 14 ppm PCB, which is clean according to law. He indicated Rose only would certify oil leaving the plant was <50 ppm.

5. American Steel Works leased the facility prior to Rose Chemical moving to the site.

6. The manhole should have been sealed with concrete.

7. The remaining oil in the tankers may cause other compartments to rupture since the oil will corrode the aluminum tank interior. There was no tankage available for the tanker's contents on site, so it would be disposed of through an oil broker.

At the present time, it appears no one will admit they are responsible for the spill or in charge of the clean up. Oil was still visible in the creek at 1130 hours May 21, 1986. Oil is still coming out of the secured storm sewer. The main gate to the site (east) is open and unattended. Visitors to the site, according to a sign, are asked to sign in at the office. The only security at the site is a 5-strand barbed wire fence, surrounding the 13-acre facility.

Steve Kay, ETI, contacted me at my residence approximately 1730 hours and indicated the following:

1. Clean up is only for "gratis."

2. Can only maintain the three-man clean-up crew.

3. Will start hand excavation of contaminated soil May 22, 1986, and place soil in 55-gallon drums.

4. Will place a berm between tanker which leaked and sewer manhole.

Attached is the ETI scenario of the spill received by EP&R May 22, 1986 (mail May 21, 1986).

Attachment

TO: File
FROM: Steven R. Kay
DATE: May 19, 1986
Subject: Oil Spill at Rose Chemicals Site

Spill first reported to ETI on Tuesday May 13 at approximately 1430 hours by Pat Perrin to Ken Kulinowski. Apparently some 200-300 gallons of treated oil had leaked onto the ground from a tank trailer parked at the loading dock in bay area #1. The torrential rain which had been falling over the previous three days had washed the oil into the berm area immediately below the dock area which encompasses all of the dock area tankage.

First indications were that all spillage and surface runoff were contained within the berm and thus first line efforts were to contain all materials within said berm. A drain line leading from the berm was leaking slightly therefore a sump was created at the point of leakage and a sump pump installed to pump any liquids directly back into the berm area. Again at this time there was no evidence of any spillage outside the berm area.

On Wednesday, May 14, all liquids in the berm area was pumped into tankage, samples were taken from the leaking tanker as well as the berm area. The following results were attained:

Tanker -	front compartment	14ppm
	middle compartment	39ppm
	back compartment	14ppm
Berm -	Top	107ppm
	Bottom Sludge	362ppm

It rained again on Wednesday Evening, and Thurday Morning, the berm area was pumped again on Thursday into tankage. No additional sampling was done.

Following another substantial rainfall on Thursday Night, Friday Morning a significant amount of oil was discovered in Pinoak Creek by local residents and reported to Missouri Department of Natural Resources who in turn reproted same to the United States Environmental Protection Agency,Region VII. ETI was notified at approximately 1600 hrs by Mr.Walter Carolan. Steven Kay and Donald Seymour arived on-scene at approximately 1700 hrs. to view the situation and meet with Missouri DNR personnel, and EPA's

Technical Assistance Team Contractors Roy F. Weston representatives. Mr. Carolan was contacted and the green light was given to continue cleanup operations which had begun earlier under the supervision of Mr. Perrin from American Steel Inc., a co-tenant of the Rose Chemicals Facility, and former employee of Rose Chemical. Oil absorbent which had been placed in the stream were left in place. Containment/Absorbent booms of straw were placed in two locations in the stream.

The oil had apparently been flushed from a storm sewer line which it had apparently entered on Tuesday, thus the storm line to Pinoak Creek was broken and diverted to the lower lagoon on the Rose Chemicals Property. The above accomplished, the site was secured at 2100 hrs. for the night.

Saturday Morning, May 17, 1986 ETI representatives arrived on site to continue efforts to cleanup the contamination and prevent recurrence fo same. The lower berm area was reinforced and expanded, the storm sewer drain at the entrance to the property was blanked off and the run on water diverted away from the storm drain in an attempt to cut back on the amount of water requiring containment on treatment. A berm was built to contain and divert any runoff from the loading dock area to the primary containment berm, and the suspect manhole was isolated. A sample taken directly from Pinoak Creek was analyzed at approximately 96 ppm.

On Sunday, May 18, 1986 the run on diversion swale was upgraded to accomodate traffic while still serving its primary purpose. A new run on diversion berm was built to divert surface waters around the secondary containment berm. Both the run-on swale and the diversion berm were read with a transit to determine their viability. ETI's Emergency Response Trailer arrived on site, along with Foreman - Gary Sondersted and Equipment Operator Donald McMahon. Operations Supervisor - Gerald Baryza and two laborers are en route. Health and Safety Officer -EMT- Fred Niles, and Technical Supervior Michael Brady are standing by to be on-site as soon as necessary.

PLANNED CONTINUED ACTION:

1. Monday, May 19, 1986 -
   ETI Foreman - Gary Sondersted and Equipment Operator Don McMahon will remove any and all oil soaked or otherwise contaminated vegetation, debris and any other material which appears contaminated. All material removed will be double bagged and placed in open drums for future removal and disposal.

2. Visible oil and oil soaked debris will be removed from both the primary and secondary runoff berms and double bagged as above, and placed in open drums for future removal and disposal.

3. A series of 6 activiated carbon columns will be put in place subsequent to the primary containment berm and prior to the secondary berm. All water passing from the primary to the secondary berm will pass through these columns. Testing will be performed on the secondary containment berm to determine the PCB Level in the water, if the water meets discharge permit parameters it will be discharged, if not it will be treated a second time, then discharged.

4. Once the primary berm area has ben emptied via the above process it will be scraped clean with a backhoe, all removed soils and sludges will be placed in open top drums for future removal and disposal. The berm collection area will then be lined with a reinforced poly liner, a center drain will be installed which will allow removal of liquid for pre treament or directly to the activated carbon system previously discussed. A recirculation pump system will be installed from the secondary containment berm to return water which does not pass the QA/QC parameters necessary for discharge under the existing NPDES permit to the primary containment area for re-treatment.

The preceeding information is true to the best of my knowledge

_____

Steven R. Kay
Vice President Special Services
Environmental Technology, Inc.

The planned Continued Action is acceptable to U.S. EPA Region VII and Missouri DNR.

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U.S. EPA

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Missouri DNR

[redacted]

[redacted]

ENVIRONMENTAL technology inc.

84 SWEENEY ST.
NORTH TONAWANDA, NEW YORK 14120

PM
MAY

USA 22

Lightning Wheels

U.S. EPA
25 FUNSTON RD.
KANSAS CITY, KS 66115

ATTENTION: Mr. George Hess

[redacted]

[redacted]

May 22, 1986

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cc: Tripp
Wagoner
Spratlin